

To: Mike Hackney[mhackney@pgei.com]
From: Suchomel, Bruce
Sent: Mon 2/13/2017 7:30:50 PM
Subject: RE: Maj Mod Draft; Antelope Creek
[Area Permit List of Mods 1-7.pdf](#)
[MajorMod Ant Creek Exp \(004\).docx](#)

Mike, it's a good thing I reviewed the modifications in our files. Attached is a list of Major Mods 1-7. You'll notice that land was added in mod 2, and I've updated the attached Major Modification draft accordingly (also attached). I've updated additional land in T4S, R3W and T4S, R4W, and T5S, R4W, and reviewed the original permit that has the land I've already included in T5S, R3W. Unless you have anything to add, this should be what's included in the *original* permit. Of course the modification stays the same.

With all of this said, it looks as though Section 36 was already included in Mod #2. Our modification to include Section 36 (E ¼) will remain moving forward, however, since we initiated the NHPA consultation. This change (Mod #8) will carve-out the four avoidance areas in Section 36 (E ¼), as communicated through the NHPA consultation.

Bruce

From: Mike Hackney [mailto:mhackney@pgei.com]
Sent: Friday, February 10, 2017 4:40 PM
To: Suchomel, Bruce <Suchomel.Bruce@epa.gov>
Subject: RE: Maj Mod Draft; Antelope Creek

Looks good to me. Have a fun weekend!

Mike

From: Suchomel, Bruce [mailto:Suchomel.Bruce@epa.gov]
Sent: Friday, February 10, 2017 4:38 PM
To: Mike Hackney <mhackney@pgei.com>
Subject: RE: Maj Mod Draft; Antelope Creek

OK, good. Attached is the updated draft major modification to reflect the 1998 modification.
(Thanks for pointing that out.)

After reviewing the file early next week I'll send out the corrected draft mod to all recipients,
and this one will go along with the website public notice.

Bruce

From: Mike Hackney [<mailto:mhackney@pgei.com>]
Sent: Friday, February 10, 2017 3:14 PM
To: Suchomel, Bruce <Suchomel.Bruce@epa.gov>
Subject: RE: Maj Mod Draft; Antelope Creek

That sounds right. There are several area boundaries out here for different things (state recovery unit, EPA permit, Tribal Unit) that are very similar but slightly different, and I tend to conflate those together.

Mike

From: Suchomel, Bruce [<mailto:Suchomel.Bruce@epa.gov>]
Sent: Friday, February 10, 2017 3:10 PM
To: Mike Hackney <mhackney@pgei.com>
Subject: RE: Maj Mod Draft; Antelope Creek

Mike, only TS4S R3W USM sections 33&34 are added (not section 32).

Bruce

From: Mike Hackney [<mailto:mhackney@pgei.com>]
Sent: Friday, February 10, 2017 9:51 AM
To: Suchomel, Bruce <Suchomel.Bruce@epa.gov>
Subject: RE: Maj Mod Draft; Antelope Creek

Thanks for looking through your files, if you didn't see anything else, then good enough. I was just surprised that we were on MM#8.

The carve-out is fine—that's kinda the law—and oil companies shouldn't go around just destroying things.

Mike

From: Suchomel, Bruce [<mailto:Suchomel.Bruce@epa.gov>]
Sent: Friday, February 10, 2017 9:05 AM
To: Mike Hackney <mhackney@pgei.com>
Subject: RE: Maj Mod Draft; Antelope Creek

Hi Mike,

Thanks for reviewing this draft so quickly. I do see the T4S R3W modification in the Antelope Creek map, outlined with a green boundary, and will include that with the draft modification language for our website's public notice.

My review of the past modifications shows no additional land to this area permit. With that said I will conduct another review of past modifications early next week – if I find anything to the contrary I'll let you know.

I do want to point out that in order to get this modification through our legal department's NHPA

expert, I needed to “carve out” the avoidance areas from the modification.

Bruce Suchomel
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USEPA Region 8 (8WP-SUI)
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Denver, CO 80202-1129
303-312-6001

From: Mike Hackney [<mailto:mhackney@pgei.com>]
Sent: Thursday, February 09, 2017 11:20 AM
To: Suchomel, Bruce <Suchomel.Bruce@epa.gov>
Subject: RE: Maj Mod Draft; Antelope Creek

Bruce,

Looking though this, I see an issue with the legal description because the final description does include lands from prior major modifications to the permit.

In the 1996-1998 timeframe there was a modification to the permit that brought in TS4S R3W USM sections 33&34 (and I believe 32 although we have no injectors in that section).

The language of this mod should read something like Original Permit Area (July 14, 1994, as amended 199X). Showing all the acreage under the previous mod(s).

We have very incomplete records of the modifications to this permit and with over 20 years having passed, I was not aware of there having been 7 previous major modifications. I was aware of two. I know we did one mod to clean up the confining zone language and another to add sections 33 & 34, but I have no idea what the other five would have been for.

There may have been additional lands added that I am was aware of (including section 36, the subject of the current mod)

Could you quickly review those other mods to see if any other lands have been added previously (including section 36).

And if you sent this to me earlier and I missed it, I apologize for not catching it then.

Mike

208-685-7630

From: Cline, Carolyn [<mailto:Cline.Carolyn@epa.gov>]
Sent: Thursday, February 09, 2017 8:39 AM
To: Mike Hackney <mhackney@pgei.com>
Cc: shaunc@utetribes.com; edreds@utetribes.com; reannint@utetribes.com; Bartholomew.stevens@bia.gov; BartP@utetribes.com; bpargeets@utetribes.com; bradhill@utah.gov; utvnmail@blm.gov
Subject: FW: Maj Mod Draft; Antelope Creek

UT20736-00000; area permit expansion

Sent: Thursday, February 09, 2017 8:28 AM
Subject: FW: petroglyph

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